

1 BUCHALTER  
A Professional Corporation  
2 KEVIN COLLINS (SBN: 185427)  
ALISSA PLEAU-FULLER (SBN: 258907)  
3 500 Capitol Mall, Suite 1900  
Sacramento, CA 95814  
4 Tel: (916) 945-5170  
Email: kcollins@buchalter.com  
5 apleaufuller@buchalter.com

6 Attorneys for Defendants  
FRANCISCO J. ZANGEROLAME,  
7 PHYSICIANS WELLNESS GROUP INC.,  
JAREOU HOLDING, LLC, NUVERUS USA, INC.,  
8 MICHAEL JAREOU,  
FRANCISCO J. ZANGEROLAME, CURTIS CRUZ  
9

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12

13 RANIF CO. dba INVISIBLE DEFENDER,

14 Plaintiff,

15 vs.

16 PHYSICIAN WELLNESS GROUP, INC.,  
JAREOU HOLDING, LLC, NUVERUS USA,  
17 INC. MICHAEL JAREOU, FRANCISCO J.  
ZANGEROLAME, CURTIS CRUZ and DOES  
18 1-100, inclusive,

19 Defendants.  
20  
21  
22  
23  
24  
25  
26  
27  
28

CASE NO. 2:20-cv-01729-TLN-KJN

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT BY MORE  
THAN 28 DAYS PURSUANT TO LOCAL  
RULE 144 (A)**

1           **IT IS HEREBY STIPULATED** by and between Plaintiff Ranif Co. dba Invisible  
2     Defender, a Nevada corporation (“Plaintiff”), and Francisco J. Zangerolame (“Zangerolame”),  
3     Physicians Wellness Group Inc. (erroneously sued herein as Physician Wellness Group, Inc.), a  
4     Texas corporation, Jareou Holding, LLC, a Texas limited liability company, Nuverus USA, Inc.  
5     (“Nuverus”), a Delaware corporation, Michael Jareou, and Curtis Cruz (collectively, “Defendants”)  
6     (Plaintiff and Defendants are hereby referred to collectively, as the “Parties”) by and through their  
7     respective counsel of record, stipulate as follows:

8           1.       On July 31, 2020, Plaintiff commenced this action by filing an unverified Complaint  
9     for damages and other relief in the Superior Court of the State of California for the County of El  
10    Dorado entitled *Ranif Co. dba Invisible Defender v. Physician Wellness Group, Inc. et al.*, and Does  
11    1 through 100, inclusive, Case No. PC20200371 (“Complaint”).

12          2.       Plaintiff personally served Zangerolame on August 11, 2020, and Nuverus on  
13    August 12, 2020.

14          3.       On August 27, 2020, Zangerolame filed a Notice of Removal and on August 28,  
15    2020, and the case was removed from state court to this Court. Moreover, the last date to remand  
16    the case was September 28, 2020 and the case has not been remanded or requested to be remanded.

17          4.       Under Federal Rules of Civil Procedure, Rule 81(c), Zangerolame and Nuverus’  
18    responsive pleadings were due on September 3 and 4, 2020, respectively.

19          5.       Pursuant to Local Rule 144(a), the parties may file a stipulation with an extension  
20    to file a responsive pleading for 28 days, but an order is required for any additional time requested  
21    beyond that.

22          6.       The Parties have not previously requested an extension for any party to respond.

23          7.       The Parties, through their attorneys, have engaged in discussions, and Defendants’  
24    counsel recently notified Plaintiff that they were recently retained to represent all Defendants  
25    (absent the DOE defendants) in this matter, and that Defendants’ counsel will accept service on  
26    behalf of all Defendants that have not yet been served, and, in exchange, Plaintiff agreed to stipulate  
27    to the requested extension of time to respond for all Defendants to respond to the complaint.<sup>1</sup>

28    <sup>1</sup> This Stipulation and any acceptance of service by counsel for Defendants does not waive any

1 8. As such, an additional extension of time for each of the Defendants to file a  
2 responsive pleading to the Complaint within the earlier date of the following: (1) 21 days from the  
3 date of the Court's Order granting this Stipulation, or (2) October 26, 2020, is warranted and in the  
4 interests of bringing all parties into the action. This will involve an extension of at least 53 days  
5 for Zangerolame and 54 days for Nuverus, who were already served in the state court matter.

6 9. WHEREFORE, the Parties respectfully request that the Court enter the proposed  
7 Order extending the date for each of the Defendants to respond to the Complaint to the earlier of  
8 the following: (1) 21 days from the date of the Court's Order granting this Stipulation, or (2)  
9 October 26, 2020.

10  
11  
12 Dated: October 2, 2020

BUCHALTER  
A Professional Corporation

13  
14 By: /s/ Kevin T. Collins

15 KEVIN COLLINS  
16 ALISSA PLEAU-FULLER  
Attorneys for Defendants  
17 FRANCISCO J. ZANGEROLAME,  
PHYSICIANS WELLNESS GROUP INC.,  
18 JAREOU HOLDING, LLC, NUVERUS USA,  
INC., MICHAEL JAREOU, FRANCISCO J.  
ZANGEROLAME, CURTIS CRUZ

19 Dated: October 2, 2020

MICHELMAN & ROBINSON, LLP

20  
21  
22 By: /s/ Samantha Gavin

23 SAMANTHA GAVIN  
Attorneys for Plaintiff  
24 RANIF CO. DBA INVISIBLE DEFENDER

25  
26  
27 applicable objections or defenses based on a lack of jurisdiction, including, but not limited to,  
28 personal jurisdiction over any of the Defendants.

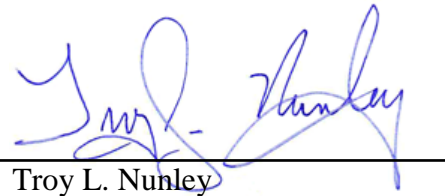
**ORDER**

Upon consideration of the Stipulation to Extend Time to Respond to Initial Complaint by More Than 28 Days (the “Joint Stipulation”) filed by the Parties, through their attorneys in this action, and good cause having been shown, it is hereby ORDERED:

1. That the Joint Stipulation is Granted; and
2. That the time for each of the Defendants to respond to the Complaint be and hereby is extended by the earlier of the following: (1) by 21 days from the date of this Order, or (2) October 26, 2020.

**IT IS SO ORDERED.**

Dated: October 5, 2020

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge